

Fergus Federal Credit Union

July 30, 2009

Federal Reserve Bank

Re: Credit Card Act  
Open-End Lending

Staff:

I am writing about our concern complying with the 21-day notice provisions for open-end plans other than credit cards set to take effect August 20, 2009, under the Credit Card Accountability Responsibility and Disclosure Act of 2009.

We currently offer open-end overdraft protection loans and open end home equity lines of credit loans. We allow members to pick their due date for any day during the month. With this new rule it would appear all the members' loan due dates would have to be about the 25<sup>th</sup> of each month. This would create a teller overload for us as all the payments would come in at the end of the month.

The new rules will burden the credit union with more statement and postage costs. The time to implement all this by August 20<sup>th</sup> is all but impossible. Usually these types of rules have a 6 to 12 month implementation time frame.

I would urge you to consider a time extension to implement this new rule as it applies to other open end loan plans.

I would be more than pleased if you just considered dropping this rule entirely for other open end rules entirely, as just let the credit card be the only rule to apply.

There appears to be no benefit for our members for other open end loan plans and just added costs and compliance issues for the credit union.

Thank you for your consideration.

Sincerely,

Robert Bjelland  
President